

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Crim. No. 10-268(2)PJS/JJK

United States of America,)	
)	
Plaintiff,)	MOTION FOR EXTENSION
)	OF TIME TO SURRENDER
vs.)	
)	
Rochelle Lynn Roen,)	
)	
Defendant.)	

Defendant Rochelle Lynn Roen, by and through her counsel, Paul Daniel Schneck, respectfully moves this Court for an order extending her voluntary report date. Ms. Roen is due to surrender for service of her sentence on Monday, October 17, 2011 (five days from now), at the Federal Prison Camp in Alderson, West Virginia (FPC Alderson). This means that she has to leave Minnesota by train no later than this Saturday, October 15, in order to report on time.

Related to this case, Ms. Roen was the victim of a violent attack by codefendant Corey Terrell Barnes, in 2011. In that attack Barnes assaulted her with his mouth, actually severing part of her lip from her face. Ms. Roen was hospitalized, and underwent surgery to reattach her lip to her face.

Mr. Barnes was charged with a felony First Degree Assault in Ramsey County, Minnesota, MNCIS Case Number 62-CR-10-5834. Ms. Roen contacted her Counsel early yesterday morning, to say that her pretrial release officer in Oshkosh had called her to tell her that the Ramsey County Attorney victim advocate had contacted him about needing Ms. Roen as a witness for that trial later this month, starting on October 24, 2011. Counsel for Ms. Roen immediately looked into the matter, and was able to determine by computer search that the case was set for trial in Ramsey County on 10/24/11, and was being prosecuted by Assistant Ramsey County Attorney Janice Barker. Counsel for Ms. Roen called Ms. Barker to confirm the

information, and spoke with Ms. Barker late last night, when she returned his phone call. She explained that she currently was in another trial, but did confirm her need for Ms. Roen as a witness in the Barnes trial. She confirmed that the felony case is set on a trial block in Ramsey County that begins on October 24, 2011, a week after Ms. Roen is currently due to report to FPC Alderson. She said that the trial block means that the case could start on 10/24/11, or anytime within four weeks following that date, meaning anytime on or before the week of November 21, 2011.

Given these facts, Ms. Roe asks this Court to extend her voluntary report date to Monday, December 5, 2011, to avoid any possible conflict with her testifying in the felony assault case against Mr. Barnes, in which she was the victim.

A proposed order is being submitted via e-mail attachment to court chambers.

Dated: October 12, 2011

Respectfully submitted,

/Paul Daniel Schneck
Paul Daniel Schneck
Attorney At Law
701 4th Avenue South, Suite 500
Minneapolis, MN 55415
Telephone: (612) 990-3390
Attorney License No. 147035